

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PURDUE RESEARCH FOUNDATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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**PUBLIC VERSION**

Case No. 6:22-cv-00119-ADA

JURY TRIAL DEMANDED

**DECLARATION OF TORBJORN NORBYE IN SUPPORT OF  
DEFENDANT’S OPPOSED MOTION UNDER 28 U.S.C. § 1404(a) TO  
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Torbjorn Norbye, declare and state as follows:

1. I am an Engineering Director at Google LLC (“Google”). I have worked at Google since [REDACTED]. I work at [REDACTED]. I have held overall responsibility for Android Lint (which includes WakelockDetector.java) since its inception. I have held overall technical responsibility for Android Studio (which includes Android Lint) since its inception. I currently have overall responsibility for Android Lint and Android Studio, and I manage the team responsible for these products. I have knowledge regarding the technical aspects of WakelockDetector.java, Android Lint, and Android Studio, as well as the overall management of the team responsible for them. If called as a witness, I could and would testify competently to the information contained in this declaration.

2. All Google engineers responsible for WakelockDetector.java, Android Lint, or Android Studio are on my team, reporting to me either directly or through other managers. The

largest group of engineers in my team is based at Google's Mountain View headquarters. No employees on my team work in the State of Texas.

3. Android Lint (which includes WakelockDetector.java) was developed and is maintained by Google engineers at Google's Mountain View headquarters. Android Studio (which includes Android Lint) was developed and is maintained by Google engineers with the largest group at [REDACTED], [REDACTED]

[REDACTED].

4. [REDACTED] is a Staff Software Engineer at Google, and is the Technical Lead responsible for Android Lint and parts of Android Studio. I have personally known [REDACTED] since [REDACTED]. [REDACTED] is a member of my team, and works at [REDACTED]. [REDACTED] has knowledge regarding technical aspects of WakelockDetector.java, Android Lint, and Android Studio.

5. Angana Ghosh worked in the Android Developer Tools team as a Product Manager from approximately [REDACTED] to [REDACTED], and was the first product manager for Android Lint. I have personally known Ms. Ghosh since [REDACTED]. Ms. Ghosh moved to another team in [REDACTED]. Ms. Ghosh works at [REDACTED]. Ms. Ghosh has knowledge regarding the design and development of Android Lint through

[REDACTED].

6. [REDACTED] is a Group Product Manager at Google, and is responsible for product management of Android Studio and Android Lint. I have personally known [REDACTED] since [REDACTED]. [REDACTED] works at [REDACTED]. [REDACTED] has knowledge regarding the design and development of Android Studio and Android Lint.

7. All Google employees working on product management of Android Lint or Android Studio are on [REDACTED] team, reporting to him either directly or through other managers. [REDACTED] team is based in [REDACTED], [REDACTED] [REDACTED]. No employees on [REDACTED] team work in the State of Texas.

8. I am not aware of any Google employees with technical, design, marketing, or financial knowledge regarding Android Studio, Android Lint, or WakelockDetector.java who work in the State of Texas.

9. As a matter of Google practice, the Google employees that create and maintain documents in Google's possession about its products and services are those employees that work on those products and services. My team follows this practice. As I discussed above, the Google engineers with knowledge of Android Studio, Android Lint, and WakelockDetector.java primarily work in Northern California; none are in Texas. As a result, following Google practice, the documents for Android Studio, Android Lint, and WakelockDetector.java would be primarily created and maintained in Northern California.

10. [REDACTED] is a Senior Staff Software Engineer at Google. I have personally known [REDACTED] since [REDACTED]. [REDACTED] is a member of my team, and works at [REDACTED]. [REDACTED] appears in the history for WakelockDetector.java as "[REDACTED]"


11. [REDACTED] is a Senior Software Engineer at Google. I have personally known [REDACTED] since [REDACTED]. [REDACTED] is a member of my team, and worked at [REDACTED] [REDACTED] until the [REDACTED], when he [REDACTED]

██████████. As of ██████████, he works at ██████████, California.

12. ██████████ is a Senior Staff Software Engineer at Google. I have personally known ██████████ since ██████████. ██████████ is a member of my team, and works at ██████████ ██████████.

13. ██████████ is a Software Engineer at Google. I have personally known ██████████ since ██████████. ██████████ was a member of the Android Developer Tools team ██████████, when he moved to a different team. ██████████ works at Google's office in ██████████.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on June 9, 2022, in Mountain View, California.



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Torbjorn Norbye